

# **Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project**

## **Public Scoping Summary**

October 2018

This document addresses the public comments received during a scoping period which occurred during August and September 2018, for the Northern Extension Pipeline and Associated Fruitland Coal Gas Horizontal Drilling Project. Scoping input was received as a result of a San Juan National Forest press release; an article in the local newspaper, *Durango Herald*; and letters and e-mails to adjacent landowners, those who had previously expressed interest in the project, and other parties that could be affected by the proposal. The Forest Service presented a preliminary Proposed Action during this timeframe.

The scoping period generated responses from 16 external sources; internal scoping is also part of the planning process. The Forest Service typically separates scoping comments into two groups: *Issues* and *Non-Issues*. *Issues* are defined as concerns or suggestions that could directly or indirectly result from implementing the proposed action. An issue also results in the generation of an alternative, part of an alternative, design criteria, or mitigation measure which specifically addresses that issue. The purpose of identifying issues at this stage of the analysis is to define the scope of the analysis and ensure that important concerns or opportunities are not overlooked.

Classification of a comment as a *Non-Issue* does not mean it is not important, it only means that it does not meet the above definition and will not be addressed in this analysis. *Non-Issues* fall within several general categories, with examples given:

- 1) Outside the scope of the proposed action or irrelevant to the decision to be made;
  - Requests for information or clarification.
  - Requests to be added to the mailing list or providing address updates.
  - Matters not under the authority of the Forest Service, such as enforcing county speed limits, and determining pay scales.
  - Concerns about actions not part of the Proposed Action (e.g. fracking, compressor station, new road to an existing well).
- 2) Already decided by law, regulation, Forest Plan, or other higher-level decision;
  - National Environmental Policy Act processes, National Forest Management Act requirements, and Executive Orders are already defined in Forest Service policy and guidance and will be followed.
  - Suggestions for what should be included in the Environmental Assessment (EA) analysis (e.g.- analysis of public health and safety impacts, analysis of impacts to wildlife, etc.) are standard procedures and will be included.
  - Permits required for development of the Proposed Action, including Archuleta County Land Use Permit, State Highway Access Permit, etc.
  - Impacts to archeological sites are avoided under standard FS policy.
  - Industry standards for pipeline construction are already in place and followed by Petrox Resources.
- 3) Opinion, conjectural, and not supported by scientific or factual evidence; or
  - A “vote” for or against a proposed action or alternative with no supporting rationale; this does not provide us with issues to be addressed or ideas for alternatives. Comments that were classified as “opinion” or conjectural are listed below:
    - “Allowing disturbance in the roadless area sets a bad precedent and opens the door for more irresponsible industrial development in the future”;
    - “There will be no thought or mention of the health or welfare of the human population or the environment” when permitting the project;

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- “We don’t need more [drilling] perforations in the earth’s crust....not sure why public comment is being solicited” because the project will be permitted anyway. “Money is way more important than anything else”;
- “The amount of methane here is finite and not worth the permanent destruction of the environment”;
- General opposition to Alternative 4;
- General opposition to the Proposed Action.

### 4) Purely supportive of, included in, or addressed by, the Proposed Action.

- Statements that make suggestions for what is already included in the Proposed Action.
- Statements of support for the proposal that do not result in the need to create an alternative.

There were recurring *Issues* mentioned throughout many of the comments. These *Issues* were grouped together by theme, and are listed in Table 1 below. A listing of all the commentors then follows in Table 2, showing which *Issues* and/or *Non-Issues* each commentor mentioned. Full text of the comments can be found in the project record.

An EA will be prepared. The *Issues* will be responded to and analyzed in either an alternative or design criteria/mitigation measures in the EA. A 30-day public comment period will be held for public review of the pre-decisional draft EA.

**Table 1. Summary of Issues**

<b>Issue Theme</b>	<b>Specific Issues</b>	<b>Commentor #</b>	<b>Where Addressed</b>
1. Air Quality	Concerned about unacceptable air quality issues including methane release and regional high ozone levels.	2, 4, 10	EA Design Criteria; EA Ch. 3 Air Quality Section
2. Wildlife/ Wildlife Habitat	Preserve wildlife habitat and natural areas. Locate new oil and gas wells to minimize visual and environmental impacts. Require site reclamation and site mitigation.	13	EA Design Criteria; EA Ch. 3 Wildlife Section
	Fragmentation of wildlife habitat.	2, 15	
	Schedule project activities and fuel reduction activities in the same area in a manner to reduce cumulative impacts on wildlife.	15	
	Project area is mapped winter range and winter concentration area for mule deer and elk. Other species found in the area include black bears, mountain lions, wild turkey, and a variety of raptors and small mammals.	15	
	Complete pre-construction biological surveys, comply with raptor nest guidelines, and screening of planned day rig activity for conflicts with known nests and roosts prior to commencing rig work.	15	
	Avoid, minimize, and mitigate adverse impacts to wildlife resources within the San Juan Basin.	15	

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<b>Issue Theme</b>	<b>Specific Issues</b>	<b>Commentor #</b>	<b>Where Addressed</b>
	Mitigate any new surface disturbance associated with the well pads, access road, and pipeline off-site per NSJB FEIS Section 3.9.6.4.2 – “every five years...the operator will conduct habitat enhancement projects”. Habitat enhancements should be commensurate with duration of the impact.	15	
	Quantify the indirect impacts to big game using the current best available science, and consider mitigating the indirect impacts to support CPW big game population objectives.	15	
	Disturbance can be detrimental to wildlife by decreasing cover, browse or grazing opportunities and buffering noise.	2	
3. Public Health and Safety	Concerned about the dangers of laying miles of pipeline through the forest and private property near the corridor of the only major east to west highway in southern Colorado. If US Highway 160 were to be impacted by a failure event, there is the potential for loss of life from the traveling public, and disruption of the highway transportation system that is the lifeblood of southwest Colorado.	2, 4, 9, 10, 14	Proposed Action – siting of pipeline; EA Design Criteria; EA Ch. 3 Public Health & Safety Section
	Fossil fuel pipelines fail due to age, improper installation, interaction with expansive soils, externalities. Failure events are often catastrophic. Siting the pipeline must be based on public safety. The impact radius of the failure event should be calculated using the diameter and the operating pressure of the pipeline (GRI formula). The siting of the pipeline must be based on these findings.	9	
	Provide operating pressure of pipeline.	5, 9, 10, 14	
	The Forest Service must inform CDOT about the GRI results and determine appropriate setback for the pipeline from the highway and traveling public. Similar setbacks should be considered to any residences in proximity to the pipeline, as well as for people accessing public lands on Forest Service roads.	9	
	Suggest locating the pipeline within the right-of-way of low volume traffic routes such as USFS system roads as compared to adjacent US Highway 160.	2	
	Transport methane by truck to avoid a dangerous pipeline.	10	
4. Visual Impacts	Locate new oil and gas wells to minimize visual and environmental impacts. Require site reclamation and site mitigation.	13	EA Design Criteria; EA Ch. 3 Visual Resources Section
	A wellsite located near the boundary/margin of the CRA may have less ground disturbance and habitat disruption due to enhancements such as reduced visual effects to private property owners.	2	

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	Past ground disturbance from previous fossil fuel development has caused scarring that is still visible after more than a decade. Due to the soil type and structure in this region of the HD's, soil disturbance results in scarring that is difficult, if impossible, to mitigate.	2, 16	
5. Impacts to Road Users	Project construction activities may impact recreation, timber, grazing, and other activities.	11	EA Design Criteria; EA Ch. 3 Road Use
6. Soils and Vegetation Impacts	Concerned that disturbed soils greatly promote the proliferation of invasive weed species.	2	EA Design Criteria; EA Ch. 3 Soils and Vegetation
	Minimize ground disturbance to reduce soils disturbance.	2	
	Any soil disturbance in this region due to the soil types becomes a long-term management challenge and expense due to water quality, weed, dust, air quality and other issues that persist.	2	
	Avoid locating pipeline on steep slopes.	2	
7. Water Resources	Concerned that soil disturbance contributes to decreased water quality.	2	EA Design Criteria; EA Ch. 3 Water Resources
	Pipeline leaks in the Sauls Creek area cause water contamination. The pipeline crosses a large, steep watershed that feeds Squaw Creek, ponds, springs, and wells.	10	
	The map incorrectly shows an existing well on the driveway. This is a test well for monitoring possible methane leaks. Have not received recent reports discussing results.	10	
	Concerned about safety of drinking water.	10	
8. Roadless Area Impacts	The Colorado Roadless Rule details many requirements regarding the placement of wellsites and associated pipeline (linear construction zones) that will need to be followed in the Tier Two CRA's of the HD's.	2	Alternatives; EA Design Criteria; EA Ch. 3 Land Use
	Route the pipeline around the roadless area. Roadless area loses its value when disturbed.	3, 10	
	The Lange Canyon wells could be connected to the Sauls Creek pipeline and the Fossett Gulch wells should be hooked up to the south. A permanent pipeline to connect one well is not worth the permanent destruction of the land.	2, 10	
	Roadless area loses its value to the public and environment if disturbed by domestic energy production.	3	
	The least expensive Alternative should not be chosen. Additional expenses may be required to minimize overall environmental degradation in the HD Mountain area that includes Colorado Roadless areas, important wildlife habitat, and is characterized as both wild and rugged topographically.	2	
9. Noise Impacts	A wellsite located near the boundary/margin of the CRA may have less ground disturbance and habitat disruption due to enhancements such as reduced noise effects to private property owners.	2	EA Design Criteria; EA Ch. 3 Noise

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	Concerned property value would decrease due to noise pollution.	10	

**Table 2. Scoping Public Commentors**

<b>Comment #</b>	<b>Commentor Name (alphabetical)</b>	<b>Affiliation</b>	<b>Dated or Received</b>	<b>Issue #</b> 1. Air Quality 2. Wildlife 3. Public Health & Safety 4. Visuals 5. Road Users 6. Soils & Vegetation 7. Water Quality 8. Roadless Area 9. Noise	<b>Non-Issue #</b> 1. Outside scope or irrelevant 2. Already decided 3. Opinion or conjectural 4. Supportive or included
1	Brown, Mary	Landowner	Sept 6, 2018	none	1 – irrelevant; fracking would not be used for the Proposed Action. 3 - opinion
2	Buickerood, Jimbo	San Juan Citizens Alliance	Sept 28, 2018	1, 2, 3, 4, 6, 7, 8, 9	none
3	DeAmico, Matt	Landowner	Sept 17, 2018	8	3 - opinion
4	Fitzgerald, Jim	Landowner	Sept 28, 2018	1, 3	2 – EA will include a detailed analysis of the negative impacts due to the Proposed Action to all relevant resources.
5	Fitzgerald, Theresa	Landowner	Sept 28, 2018	3	1- land management decisions on adjacent landowner properties outside of the jurisdiction of the Forest Service; not enough information to comment on pipeline. 2 - EA will include a detailed analysis of the negative impacts due to the Proposed Action to all relevant resources, including impacts to public health and safety. 3- opinion; opposed to Proposed Action.
6	Gilbert, Chad	Landowner	Sept 9, 2018	none	1 – it is outside Forest Service’s jurisdiction to evaluate the pay of employees working on proposed project. 2 – industry standards for pipeline construction already in place and followed by Petrox Resources.

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7	Heinlein, Jo	CDOT Permits Program Manager	Sept 21, 2018	none	2 – State Highway Access Permit. 4 – supportive of Alternatives 1 and 2
8	Hitzeman, Mathijs	Landowner	Sept 7, 2018	none	2- the fact that there will be drilling was decided at the leasing stage 3 - opinion
9	Joswick, Josh	Earthworks	Sept 18, 2018	3	1 – wants more information about what constitutes a highway corridor; wants to know the pressure of the proposed pipeline and the size and pressure of existing Fossett Gulch pipeline.
10	Powers, Leslie & Vance, Julie	Landowner	Sept 28, 2018	1, 3, 7, 8, 9	1 – irrelevant; fracking would not be used for the Proposed Action. A compressor station would not be built for the Proposed Action. 2- cultural resources are avoided by policy 3 – opinion; opposed to Proposed Action
11	Salisbury, Steve	American Motorcyclist Association	Sept 10, 2018	5	none
12	Sawyer, Lisa	Landowner	Sept 10, 2018	none	1 – irrelevant; 1.5 miles of new road would not be constructed across National Forest to reach Fed #25A-1 well for Alternative #4; it is outside Forest Service's jurisdiction to enforce speed limits on County roads. 3 – opinion; opposed to Alternative #4
13	Shepard, John C.	Archuleta County Planning Department	Sept 21, 2018	2, 4	2 – Archuleta County Land Use Permit

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14	Stiles, Dennis	Western Ranchers Alliance	Sept 17, 2018	3	2 – industry standards for pipeline construction are already in place and followed by Petrox Resources.
15	Thorpe, Matt	CO Parks & Wildlife	Sept 20, 2018	2	1 – provide clarification on the mitigation requirements described in the NSJB FEIS.
16	Williams, Laurie	Landowner	Sept 7, 2018	4	3- opinion; opposed to the Proposed Action.